

BOARD OF BEHAVIORAL SCIENCES

INITIAL STATEMENT OF REASONS

Subject Matter of Proposed Regulations: **USE OF LICENSE NUMBER IN DIRECTORIES AND ADVERTISEMENTS**

Amend Section 1811 of Division 18 of Title 16

Specific Purpose of each adoption, amendment, or repeal:

The specific purpose of this proposal is to further delineate the advertising requirements for Associate Clinical Social Workers and delete an obsolete reference to the advertising requirements for professional corporations.

Factual Basis

The Board's mandate is to protect the health, safety and welfare of California consumers. One of the Board's highest priorities is to protect consumers by ensuring that registered and licensed professionals governed by the Board represent themselves appropriately to the consuming public. The Board has realized that the requirements for appropriate advertising for Associate Clinical Social Workers had been inadvertently left out of Section 1811. Additionally, Section 1811 includes advertising requirements for professional corporations and the registration process of these corporations is no longer completed through the Board.

The amendments to Section 1811 are necessary to ensure that Associate Clinical Social Workers have a clear understanding regarding their advertising responsibilities and to delete the obsolete advertising requirements for professional corporations.

Underlying Data

None

Business Impact

This regulation will not have a significant adverse economic impact on businesses.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No alternative which was considered would be either more effective than or equally as effective as and less burdensome to affected private persons than the proposed regulation.

Set forth below is the alternative, which was considered, and the reason the alternative was rejected:

Alternative #1: Not amend the Use of License Number in Directories and Advertisements and continue to provide erroneous information regarding professional corporations and not provide the detailed necessary information that Associate Clinical Social Workers must know when advertising their professional services. This alternative was rejected because current regulation could potentially put consumers at risk since the requirements for advertising are not clearly defined elsewhere. It is also necessary to revise the document to reflect current law regarding professional corporations.